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February 5, 2025

**Via ECF**

Honorable Frederic Block  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Insurance Company et al v. Akiva Imaging, Inc., et al.*  
Civil Case No.: 1:24-cv-06549-FB-JAM

Dear Judge Block:

We represent Plaintiffs (collectively “GEICO”) in this matter and write, with consent of all Defendants<sup>1</sup> and pursuant to Your Honor’s Order dated January 30, 2025, to request that the Court approve the below briefing schedule with respect to the following two motions: (1) Akiva Defendants’ Motion to Dismiss or, in the alternative, Stay the Federal Action and/or Compel Arbitration; and (2) GEICO’s Motion to Stay Defendants’ Pending No-Fault Collections Lawsuits and Arbitrations and Enjoin Defendants From Filing New No-Fault Collections Proceedings During the Pendency of this Action. Specifically, the parties have agreed as follows:

- The parties’ respective opening papers to be served by email on or before March 4, 2025;
- The parties’ respective opposition papers to be served by email on or before March 18, 2025; and
- The parties’ respective reply papers, if any, to be served by email on or before March 25, 2025.

On or before March 25, 2025, GEICO will coordinate with Defendants to file the fully briefed motions with the Court via ECF.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ John P. Mulvaney

John P. Mulvaney

cc: All counsel *via* ECF

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<sup>1</sup> Though Defendants Healthcare Medical Services PLLC and Hanan Miller, M.D. (collectively, the “HMS Defendants”) take no position on the motion of the remaining Defendants (collectively, the “Akiva Defendants”), the HMS Defendants consent to the briefing schedule in order to reserve their right to file separate opposition papers to GEICO’s motion in the event they deem such opposition necessary after review of GEICO’s motion.